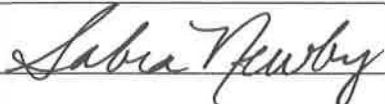


CITY OF RENO – Policies and Procedures	
Media and Communications	
Approved by: Sabra Newby, City Manager	Number: 102
	Effective Date: 08-02-2018

I. PURPOSE

The purpose of this policy is to provide uniform guidelines by which information regarding City activities, issues, initiatives, and policies will be disseminated to the media and public; guidance for employee use of social media; an outline of the City's policy for assessing and managing comments and replies posted on City of Reno social media accounts; guidance on the use of linked websites; and procedures for retaining records of social media posts.

The purpose of this policy is also to clarify the roles and responsibilities pertaining to the City of Reno website; set forth the procedures for creating and maintaining content; and establish guidelines for web content and hyperlinks.

II. REVISION HISTORY

08-02-18 Adopted

III. REFERENCES

Not applicable.

IV. PERSONS AFFECTED

All City of Reno employees and individuals who edit, maintain, or furnish information for media, social media, or the City's website including City officials, appointed members of boards/commissions, external groups, vendors, and individuals.

V. POLICY

It is the policy of the City of Reno to foster a beneficial relationship with the news media based on information that is accurate, timely, objective, and reflective of the position of the City Council and City Manager. Because traditional news media is one of the City's primary means of effectively communicating with citizens and visitors, it is imperative that information released to newspapers, television, and radio is a factual portrayal of the situation or issues facing the City. Further, it is the policy of the City to be accessible to the news media and to provide information in a systematic, cohesive manner calculated to have the widest reach into the community.

It is also the policy of the City of Reno to recognize the value of social media for reinforcing brand recognition, engaging constituents and employees in conversation, and for delivering information to the public. The City leverages the power and reach of social media to communicate and deliver messages directly to citizens and to encourage citizen involvement, interaction, and feedback. To best manage online relationships and conversations, only those officially designated by the City of Reno have the authorization to speak on behalf of the City. Given the immediate nature of these tools, the City will take a controlled, strategic approach to the use of social media to ensure information is current and appropriate and that responses to constituent requests and questions are accurate and timely. Employees involved in social media management are responsible to know and uphold the City of Reno's rules of conduct and ethical standards.

The best City of Reno uses of social media tools fall into three categories:

- Channels for disseminating time-sensitive information as quickly as possible;
- Marketing/promotional channels which increase the City's ability to broadcast its messages to the widest possible audience; or
- Efficient and effective engagement tool for citizens to communicate with the City.

Finally, it is the policy of the City of Reno to provide and maintain a high quality website in order to efficiently deliver government services, information, and communications to the public. A concerted effort shall be made to ensure website content is accurate, up-to-date, and presented in an effective manner. Technology enhancements and new features on the City website are important for the City to continue to meet the ever-growing needs of citizens and staff. Such improvements shall be considered based on need, benefit, cost-efficiency, and appropriateness for the City website. The domain name Reno.gov shall be considered the primary domain for the City of Reno for marketing and branding purposes with a goal to assist in uniting all City departments, programs, and services under the umbrella of one easy-to-recall City of Reno brand. The City may acquire and promote ancillary domain names depending on appropriateness and need.

In a crisis communications situation or when the Regional Emergency Operations Center is activated, media and communications roles may be delegated to certain appropriate personnel on a temporary basis until the situation is resolved.

VI. DEFINITIONS

Not applicable.

VII. RESPONSIBILITIES

- A. The Office of Communications and Community Engagement (OCCE) is responsible for:
 - 1. Acting as the City's central public information and communications center;

2. Coordinating public affairs and media relations;
 3. Coordinating the release of information to the public through all available communications avenues;
 4. Testing, selecting, and implementing the use of communications tools, including social media, in coordination with the Director of Information Technology;
 5. Monitoring and responding to public comments, questions, and requests; and
 6. Providing the City Council, departments, and employees with support, training, and assistance in media relations and speech writing.
- B. The Office of the City Attorney is responsible for:
1. Determining what information is confidential, privileged, or otherwise exempt from public disclosure; and
 2. Reviewing the legal terms and conditions required for creating a social media account.
- C. Department heads are responsible for:
1. Assigning staff, as needed, additional duties as content editors for social media for official City of Reno social media assets or, upon approval of the Office of the City Manager, management of appropriate departmental social media assets;
 2. The integrity and content of the pages within their section of the official City of Reno website and Intranet;
 3. Assigning staff to serve as content editors to update and maintain timely and accurate information within their section of the official City of Reno website while abiding by the established website design, image, and hyperlink standards to ensure a consistent look and feel across all pages and ease of use for site visitors; and
 4. Keeping the Digital Engagement Program Manager informed of applicable staff assignments.
- D. Content editors are responsible for:
1. Posting and maintaining timely and accurate information within their assigned areas of the City website;

2. Abiding by the established website design, image, and hyperlink standards to ensure a consistent look and feel across all pages and ease of use for site visitors;
 3. Content on department-specific social media channels;
 4. Upkeep of any social media sites their department may create; and
 5. Posting content according to City of Reno policy.
- E. City employees are responsible for:
1. Posting to City of Reno social media accounts only if assigned to do so by the appropriate authority within this policy;
 2. Conducting their personal social media activities in conformance with this policy; and
 3. Knowing and upholding the City of Reno's rules of conduct and ethical standards as outlined within City policies.
- F. The City Manager, Assistant City Manager, Chief of Staff, Director of OCCE, or Communications Program Manager may designate a spokesperson for a particular issue. In such cases, the designator is responsible for notifying all departments of the designation(s) so that all inquiries on that subject can be referred to the spokesperson.

VIII. PROCEDURES

A. General Communications

1. Media Communications
 - a. OCCE must be informed of all news media interviews through face-to-face, telephone, text message, or email communications. OCCE must be contacted before a scheduled news media interview, or directly after an unscheduled interview, to ensure that all parties are aware of the general angle of the story.

- b. Department heads and their designees are authorized to communicate on behalf of the City with the news media about their areas of operational expertise. When communicating with the news media on behalf of the City, staff shall avoid making editorial comments or predictions about future policy decisions. On matters involving City policy, department heads and their designees shall seek assistance from OCCE. All other City staff shall refer news media inquiries to the appropriate department head or to OCCE.
- c. Initiating communications with the news media on a proactive basis may only be done with the City Manager's approval through the Director of OCCE and/or the Communications Program Manager. Public safety spokespersons must alert OCCE of all proactive communications plans on a monthly basis using the Citywide Editorial Calendar.
- d. When media coverage contains factual errors which materially affect the public's perception of an issue, department heads are to contact the City Manager and Director of OCCE with the correct information. If the City Manager makes a determination that a correction is needed, the Director of OCCE, in coordination with the City Manager, will determine the best course of action to obtain a correction.
- e. e. In cases of editorial discrepancy, including letters to the editor or other public comment, the City Manager, or designee, will determine whether a response by the City is appropriate, who shall make a response, and will give final approval of any and all statements made in response.
- f. Department heads will notify the City Manager and Director of OCCE of issues and events that are likely to be of interest to the public and media. The City Manager will determine if it is appropriate to contact the City Council and/or other department heads.
- g. News conferences may be convened only at the direction of the Mayor, the City Council as a whole, the City Manager, Fire Chief, or Police Chief. Other than the day-to-day operations of the public safety spokespersons, all Citywide news conferences will be coordinated by OCCE.
- h. OCCE has an updated Media Training Guide available to employees as a resource.

2. Reno Fire Department

- a. The Fire Chief can act as a spokesperson or assign staff additional duties as spokesperson for the Reno Fire Department. Those positions become spokespersons and media contacts for operational issues related to their department only.
- b. In special circumstances involving non-policy matters relating to public safety, the Fire Chief may, with prior notification to the City Manager and Director of OCCE, convene a news conference in conjunction with OCCE.
- c. During an emergency incident that warrants the immediate notification of the City Manager and City Council and/or has a high level of local and national media interest, OCCE must be informed of the situation as quickly as possible to ensure that media is receiving factual information.

3. Reno Police Department

- a. The assigned Public Information Officer is the spokesperson and media contact for operational issues related to the Reno Police Department. The Police Chief may assign an alternative spokesperson if the situation dictates such action as necessary.
- b. In special circumstances involving non-policy matters relating to public safety, the Police Chief may, with prior notification to the City Manager and Director of OCCE, convene a news conference in conjunction with OCCE.
- c. During an emergency incident that warrants the immediate notification of the City Manager and City Council and/or has a high level of local and national media interest, OCCE must be informed of the situation as quickly as possible to ensure that media is receiving factual information.

4. Legal Issues/Pending Litigation: All inquiries regarding individual privacy, pending or threatened litigation, and other legal matters shall be referred the Office of the City Attorney. The Office of the City Attorney will work with OCCE and the affected department to determine the appropriate method for responding to these inquiries.

5. Emergency Incident Information: OCCE shall direct, manage, and staff the information section within the Incident Command System whenever a citywide crisis incident occurs. Qualified individuals from within City departments will be utilized as needed to support the information section as requested by the City Manager, or designee. Qualified individuals from cooperating agencies may be utilized as determined by the magnitude and longevity of an emergency incident.
6. Employee Articles/Publications: Employees whose City-related articles are published in print or online must submit a copy of the published article to their department head, who will forward a copy to the City Manager and OCCE.

B. Social Media Communications on Behalf of the City of Reno

1. Selection of Social Media Accounts

- a. The account must be accessible to anyone above the age of 18 and available free of charge to users. No site that limits access to services based on race, ethnicity, religion, sexual orientation, or disability shall be used by the City.
- b. The Digital Engagement Program Manager is responsible for creating all new social media accounts. No new accounts are to be created by any other City employee unless under the direction of the Digital Engagement Program Manager.
- c. Profiles, networking sites, blogs, or other social media accounts should have comments limited to authorized users of those sites or require registration to discourage anonymous posts and comments.
- d. Departments wishing to create and manage department-specific social media accounts must submit a request for approval to the Director of OCCE.
- e. All social media accounts will be managed by the Digital Engagement Program Manager who will maintain a list of social media tools which are approved for use by City departments and staff.

2. Content Development

- a. To ensure efficient use of resources, content developed for social media uses should be located on and linked to the City's official website whenever possible.

- b. All content, including photos and videos, must be owned by the City or have the appropriate release or authorization from the copyright holder.
- c. Content related to crisis or emergency communications must conform to the policies and procedures contained within the relevant plans.

3. Design and Branding

- a. All social media accounts should be clearly identified as official City of Reno assets and prominently display the official City of Reno logo.
- b. Social media accounts should be designed to emulate the City's website. Design colors should be consistent with the official colors in use by the City, as identified in the current brand standards, available on the intranet.
- c. When possible, third-party advertising should be removed or disabled on official City social media pages. If this is not possible, a statement should be added that the City does not authorize or endorse any advertisement on the site.

4. Management and Monitoring

- a. The Digital Engagement Program Manager will make use of available and appropriate online monitoring tools to ensure conformance with this policy, quality, and consistency.
- b. The Digital Engagement Program Manager will maintain a list of all City of Reno social media sites, including login and password information and Content Editors.
- c. Content Editors should monitor the list of users who follow or friend City social media accounts to ensure that spam, obscene material, material not within the authorized scope of a limited public forum, or strictly commercial messages are not introduced into the City's communications.

C. Use of Social Media by Employees

1. Use of Social Media as an Authorized City Representative

- a. Content Editors engaged in social media should take responsibility for what they write, identify themselves as the author, exercise good judgment, and use common sense.
- b. When posting or responding to posts as a City representative from their personal accounts, employees should always include their name, title, and identify themselves as a City employee. When posting from an official City of Reno account, they should identify themselves when appropriate or if asked.
- c. When an employee participates in a blog, wiki, online social network, or any other form of social media as a representative of the City, certain standards of conduct apply:
 - 1) City representatives should always show respect. Never use ethnic slurs, personal insults, obscenity, or any conduct that would not be acceptable in the City's workplace. Show consideration for others' privacy and for topics that may be considered objectionable/inflammatory.
 - 2) Employees should avoid engaging in arguments, be the first to correct their own mistakes, and indicate if they have altered previous posts.
 - 3) All content and posts should be designed to add value. Employees should strive to provide worthwhile information and perspective.
- d. The City promotes transparency and honesty in communications and therefore employees may not post anonymously or use pseudonyms/misleading screen names when representing the City.

2. Guidelines for Private Use of Social Media

- a. Employees shall not use their City of Reno email address as the primary account information for any private or work-related social media site unless authorized by the Director of OCCE. Employees must keep City of Reno social media accounts separate from personal accounts.

- b. Employees should be familiar with these guidelines and other City policies and ensure that postings are consistent with these policies. Refer to Section IX(A) of this policy regarding free speech as it applies to private social media use.
- c. Monitoring personal social media, including micro blogging, SMS, text messaging, or instant messaging accounts must not interfere with an employee's work for the City. Employees should not work on a personal social media account or blog during scheduled work time (excluding breaks) or on City electronic devices.
- d. Employees not acting in their official capacity shall not represent or give the impression that they are acting in their official capacity.
- e. If an employee can easily be identified with, or identifies themselves as, a City of Reno employee on their blog or other social media profile, they should make it clear to their readers that the views expressed in their blog entries do not necessarily reflect the City's views. To help reduce the potential for confusion, the following notice—or something similar—should be put in a reasonably prominent place on their site:

“The views expressed on this blog are mine alone and do not necessarily reflect the views of my employer, the City of Reno.”
- f. Employees should keep in mind that work-related complaints are more likely to be resolved by speaking about the issues directly with co-workers or superiors than by posting complaints to a social media outlet. Employees opting to post complaints or criticism should avoid using statements, photographs, video or audio that might:
 - 1) Reasonably be viewed as malicious, obscene, threatening or intimidating;
 - 2) Disparage residents, customers, vendors, agencies or contractors; or
 - 3) Constitute harassment or bullying.

D. Linking Policy and Disclaimer of Endorsement

- 1. The City shall review and reserves the right to reject any hyperlink to a site not maintained by the City.

2. If any hyperlink to a non-City site is posted by the City or permitted in a comment, the City social media site should note that any link to a site which is not the City's site is provided solely for the constituent's information/convenience and does not necessarily reflect the views of the City. Further, that the City does not control or guarantee the accuracy, relevance, timeliness, or completeness of information contained on a linked website and is not responsible for transmissions users receive from linked websites.
3. Inclusion of hyperlinks should be limited, depending upon the type of social media public forum created:
 - a. Government Speech: Where the City is furthering its own message, the City reserves the sole right to exclude any link and shall only include links which further communicate the City's message;
 - b. If the City creates a designated public social media forum, links shall be excluded if they contain material or depictions which are obscene, threatening, harassing, maliciously defamatory, copyrighted, or commercial; or
 - c. If the City creates a limited public social media forum, links may be excluded entirely, or permitted subject to any limitations listed on the site or stated in this policy.

E. Records Retention

1. When deleting comments or posts, staff should save a screen capture as a JPEG of the content and send it to the Public Information Officer and the Office of the City Clerk for archiving.
2. The City will retain copies of the legal terms and conditions required for creating a social media account.

F. Comments and Replies

1. To encourage engagement and increase transparency, it is the City's intent to leverage social media as a method of two-way communications. To that end, when the appropriate resources are available, comment and forum features will be activated to allow users to make comments, ask questions, or request services.
 - a. When activated, comments and forums will be reviewed every work day.

- b. Staff will assess the content of each post or comment to determine it meets the standards described or if it requires a response from the City.
 - c. Posts or comments requiring a response will be answered within a reasonable amount of time depending on the type of request. Whenever possible, responses will be made immediately.
 - d. Posts or comments requiring a service request will be submitted to Reno Direct for inclusion in the customer relationship management system.
- 2. City employees should immediately remove any comment which violates any local, state, or federal law regarding discrimination, harassment, or violence.
- 3. In a designated public social media forum created by the City, the City shall delete or reject posts from users that contain content that is obscene, threatening, harassing, maliciously defamatory, copyrighted, or commercial.
- 4. In a limited public social media forum created by the City, in addition to any other limitations imposed on the specific site by the City, the following posts or comments could be removed or deleted under the advisement of the Office of the City Attorney:
 - a. Obscene, vulgar, threatening, harassing, or maliciously defamatory comments;
 - b. Comments not related to the specified subject or including substantially unrelated material (although portions relate to the specified subject);
 - c. If applicable, comments from persons or groups not within the permitted commentator group or other limitations of a limited forum;
 - d. Comments promoting or opposing any person campaigning for election to a political office or promoting/opposing any ballot proposition;
 - e. Comments promoting or advertising a business, commercial transaction or containing copyrighted material; or
 - f. Overtly self-promoting comments.

5. Comments shall not be deleted or removed based upon the views expressed, subject to guidelines within this policy. Comments will not be edited. Applicable limitations should be posted on the social media site. Hyperlinks may be prohibited in their entirety or they may be deleted/removed where the linked site includes material falling within the above listed prohibitions.
6. Unless the City specifically states on a social media system that communications on that specific system shall be considered as official communications with the City for a specific purpose, communications made through a social media system will in no way constitute a legal or official notice nor comment by/to the City or by/to any official/employee of the City for any purpose. Comments specific to a City license, application, permit, project, etc., should be submitted directly to the appropriate City official, department or division, as indicated at www.reno.gov.

G. City Website

1. Content

- a. Content editors must adhere to the following standards to ensure consistency and intuitive use of the site:
 - 1) Use the established set of templates and design standards that apply to all pages and features of the website;
 - 2) Write in a customary business style appropriate for online users, without use of slang or jargon; and
 - 3) Use a style of writing that utilizes hyperlinks, so that website users can intuitively access internal and external links.
- b. Use of Images on the Website
 - 1) All images used on the City of Reno website will comply with the established image standards.
 - 2) Use of images on the website will comply with copyright law. See the City of Reno Website Disclaimers available online.

2. External Links

- a. External links are allowed when appropriate, especially to City-sponsored organizations, not-for-profit websites, and government websites. Links to for-profit websites are permissible under limited conditions, provided the content is appropriate. Links from the City of Reno's website to other sites on the internet do not constitute an endorsement of the City of Reno. These links are provided for informational purposes only. It is the responsibility of the user to evaluate the content, quality, and accuracy of materials or information obtained from other sites.
- b. All external links must conform to the following standards: Appropriateness of external links must be approved by the respective department head and the Digital Engagement Program Manager.

3. Advertising: Advertising is not allowed on the City of Reno website. In the event that an organization or business sponsors or partners with the City of Reno for an event, project, program, campaign, or similar, the City may display on the City website images and external links for the entity, to the extent that it pertains to the function or program. The use of these images and external links must comply with this policy.

4. Elected Official Web Pages: Elected Officials' web pages must be approved by both the elected officer and the City's Digital Engagement Program Manager. The Digital Engagement Program Manager must ensure compliance with all parts of protocol. The website is taxpayer-funded and may not be used for political campaign purposes. Website pages for elected officials may only provide the following information:

- a. Name, photograph, and contact information for the elected official;
- b. Elected position held by the elected official;
- c. Elected official's professional resume;
- d. Biographical information about the elected official, including personal interests and family information; and
- e. Links to organizations, boards, or commissions on which the elected official serves in his/her capacity as an elected official.

5. Privacy: All information collected via the City of Reno website will comply with the privacy statement available on the City of Reno website.

IX. FIRST AMENDMENT PRINCIPLES

- A. In addition to other applicable laws, social media issues may implicate First Amendment rights. This section is intended to provide general guidance on First Amendment principles. Consult the Office of the City Attorney to seek further legal guidance, if necessary. Most City of Reno social media sites should be designed to be either government speech or limited public forums.
- B. Free Speech
 - 1. When Employees make statements pursuant to their official duties, they are not speaking as private citizens for First Amendment purposes, and such speech is not protected from discipline by the City if it violates this or other City policies.
 - 2. Employees may exercise their rights of free speech as private citizens, regarding any issue, as long as this provided that it is done on their own time or within their authority as the designated representatives of an employee association.
 - 3. The First Amendment does not protect City employees from discipline when their speech interests are outweighed by the City's interest in providing efficient and effective services to the public. The following is a non-exclusive list of speech that may subject employees to discipline up to and including termination:
 - a. Speech that impairs the mission or values of the City, adversely affects any employee's job performance or ability to perform essential job functions, or otherwise adversely affects residents, customers, vendors, agencies, contractors, or other people who work on behalf of the City or its legitimate interests;
 - b. Speech ridicules, maligns, disparages, harasses, or otherwise expresses discrimination against any race, religion, or other status protected by law;
 - c. Speech that threatens violence or other inappropriate or unlawful conduct;
 - d. Speech containing obscene or sexually explicit language, images, or acts;
 - e. Speech that divulges the City's confidential, proprietary, or non-public information.

4. Expressions of personal opinion shall not be distributed on City stationary or paper; emailed via a City of Reno issued email address, mailed at City expense; or prepared on City time (except as may be allowed under the terms of the applicable labor agreement with regard to conducting employee association business). When expressing personal opinions, City employees may not include their official job title, nor intimate that their comments are on behalf of the City.
5. The provisions of this Policy should not be construed as limiting or curtailing speech that constitutes concerted activity under applicable labor laws.

C. Government Speech

1. Where the City intends to convey its own message, third parties' First Amendment rights are seldom an issue. Speech may be "government speech" where:
 - a. The message furthers some City interest;
 - b. The City controls the message; and
 - c. The City is the messenger or controls the messenger and/or message.
2. Where the City uses a third party to convey the City's message, it is still government speech, provided the City exercises effective control over the selection and dissemination of the message.

D. Forum Analysis

1. When the City opens up a place or means of communication to outside messages, those third party messages are usually not government speech, and may be entitled to different levels of First Amendment protection. How much protection depends on different factors, most importantly, what type of "forum" is created by the City.
2. Traditional Public Forum: Speech in parks, sidewalks, and streets enjoys highest levels of protection. Regulation of content is only allowed to further a compelling City interest. Regulation of time, place, and manner of expression are permitted if they actually further a significant governmental interest, are narrowly tailored so as not to interfere with more speech than is necessary, the speaker has alternative means of conveying their message, and adequate standards prevent arbitrary enforcement that lends itself to content discrimination.

3. Designated Public Forum: The City may intentionally open up a forum to third party communication. An example would be opening an unrestricted feedback section to the public on a website. The standard for regulating speech in a designated public forum is the same as in a traditional public forum. If a designated public forum is created, any City personnel with the ability to censor communication should be very familiar with First Amendment limitations and consult the Office of the City Attorney when in doubt.
 4. Limited Public Forum: In a limited public forum, the City creates a channel for a specific or limited type of expression where one did not previously exist, and may reserve the forum for certain groups or for the discussion of certain topics, subject only to the limitation that its actions must be viewpoint neutral and reasonable in light of the purpose served by the forum and all surrounding circumstances. Where the City intends to create a limited public forum, but fails to properly limit it, or fails to enforce those limits, it may result in the forum becoming a designated public forum.
 5. Non-Public Forum: The City may create a non-public forum for a particular purpose or for specific participants, as long as the regulation on speech is reasonable and not an effort to suppress expression merely because public officials oppose the speaker's view.
- E. Non-Work Related Conduct: Employees can be disciplined for non-work related conduct, such as web use, emailing, SMS messaging, or posting inappropriate pictures or videos taken with a personal cell phone while performing official City functions to a social media site, if it becomes public knowledge and the governmental interest asserted to justify its disciplinary action is greater than the employee's First Amendment rights or other interests.

END